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December 31, 2014

The Honorable Jesse M. Furman United States District Court for the Southern District of New York 500 Pearl Street New York, NY 10007

Re: In re: General Motors LLC Ignition Switch Litigation,

14-MD-2543 (JMF); 14-MC-2543

Dear Judge Furman:

Pursuant to this Court's Order No. 15 § 9, counsel for General Motors LLC ("New GM") file this letter to serve upon Lead Counsel, Plaintiff Liaison Counsel, and Federal/State Liaison Counsel "copies of all Complaints, Coordination Orders, Protective Orders, ESI Orders or other Discovery Orders, and Orders designating plaintiffs' liaison counsel" that have been entered in Coordinated Actions.

Attached hereto as Exhibit 1 is an index which identifies each Coordinated Action. Attached hereto as Exhibits 2–4, respectively, are copies of all Complaints, Coordination Orders, Protective Orders, ESI Orders or other Discovery Orders, and Orders designating plaintiffs' liaison counsel that have been entered in the Coordinated Actions since New GM's December 1, 2014 update (ECF No. 441).

Respectfully submitted,

Richard C. Godfrey, P.C. Andrew B. Bloomer, P.C.

Counsel for Defendant General Motors LLC

cc: Lead Counsel for Plaintiffs
Federal/State Liaison Counsel
Plaintiff Liaison Counsel
Counsel of Record for Defendants